

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**Robert E. Scott, Jr.** :  
**Debtor** :  
: **NO. 19-15079 AMC**  
:

**MOTION TO RECONSIDER THE JULY 28, 2020 ORDER**  
**DISMISSING THE CHAPTER 13 BANKRUPTCY**

Comes Now, Robert E. Scott, Jr., hereinafter referred to as “Debtor” and moves this Honorable Court to vacate its July 28, 2020 Order Dismissing the instant matter and in support thereof aver the following:

1. The above-captioned bankruptcy matter was filed as a Chapter 13 on or about August 13, 2019.
2. The Debtor’s case prior to confirmation was dismissed on July 28, 2020, for failure to make trustee plan payments.
3. The Court Order retained jurisdiction to set deadlines to allow Application of Administrative Expenses, if any.
4. At the time of Debtor’s dismissal, he paid Three Thousand (\$3,000.00) Dollars to the Trustee. An amended plan was filed on April 23, 2020, acknowledging these payments and proposing a schedule for Debtor to make monthly payment of \$691.00, starting May 2, 2020 and continuing for fifty two (52) months, a total of Thirty Eight Thousand Nine Hundred and thirty two (\$38,932.00) Dollars.
5. Unfortunately, Debtor was unable to make payments to the Trustee, from May 2, 2020 through July 2, 2020, as his unemployment compensation benefits issued by the Pennsylvania Department of Labor and Industry were delayed.

6. Although, this delay continued for a number of months, Debtor's unemployment compensation benefits were finally issued, retroactively, on or about July 24, 2020 and although Debtor had the necessary funds to become current, he was unaware of the re-listed Court hearing scheduled on July 28, 2020.

7. Receipt of the retroactive unemployment compensation benefits, places Debtor in a position to become current as provided in the amended plan. If the Court grants said Motion for Reconsideration, then Debtor is prepared to immediately pay Three Thousand Four Hundred and Fifty Five (\$3,455.00) Dollars to the Trustee, which will bring him current through and including the month of September, 2020. (Copy of debtor's unemployment compensation debit card showing a balance of \$6,256.33 is attached hereto and marked Exhibit "A")

8. Should Debtor's motion requesting reconsideration to reinstate his Chapter 13 bankruptcy, be granted, this would allow the Debtor to finalize confirmation of his amended plan which would serve the interests of the creditors and serve judicial economy, allowing the bankruptcy process to move forward and ultimately providing the Debtor with his discharge.

WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court reconsider its July 28, 2020 Order and grant Debtor's request to have his Chapter 13 Bankruptcy case reinstated

August 11, 2020

\s\ MICHAEL A. LATZES  
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